

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LAWRENCE MALLY, On Behalf of Himself : Civil Action No. 1:07-cv-07097-DLC  
and All Others Similarly Situated, :  
: CLASS ACTION

Plaintiff, :

vs. :

QIAO XING UNIVERSAL TELEPHONE,  
INC., et al., :

Defendants. :

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MILTON PFEIFFER, On Behalf of Himself : Civil Action No. 1:07-cv-07252-DLC  
and All Others Similarly Situated, :  
: CLASS ACTION

Plaintiff, :

vs. :

QIAO XING UNIVERSAL TELEPHONE,  
INC., et al., :

Defendants. :

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[Caption continued on following page.]

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NOTICE OF MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF  
AND FOR APPROVAL OF SELECTION OF LEAD COUNSEL

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ISAAC FISHMAN, CUSTODIAN FOR THE : Civil Action No. 1:07-cv-07312-DLC  
IBF FOUNDATION, On Behalf of Itself and :  
All Others Similarly Situated, : CLASS ACTION  
Plaintiff, :  
vs. :  
QIAO XING UNIVERSAL TELEPHONE, :  
INC., et al., :  
Defendants. :  
  
MICHAEL LOCKE, Individually and On : Civil Action No. 1:07-cv-07693-DLC  
Behalf of All Others Similarly Situated, :  
Plaintiff, :  
vs. :  
QIAO XING UNIVERSAL TELEPHONE, :  
INC., et al., :  
Defendants. :  
  
REUVEN LAPIN, Individually and On Behalf : Civil Action No. 1:07-cv-07829-DLC  
of All Others Similarly Situated, :  
Plaintiff, :  
vs. :  
QIAO XING UNIVERSAL TELEPHONE, :  
INC., et al., :  
Defendants. :

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PLEASE TAKE NOTICE that Institutional Investor Macomb County Employees' Retirement System ("Macomb County") will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) consolidating the Actions; (ii) appointing Macomb County as Lead Plaintiff; (iii) approving Macomb County's selection of the law firm of Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Macomb County submits herewith a Memorandum of Law and Declaration of Mario Alba Jr. dated October 9, 2007.

DATED: October 9, 2007

COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP

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*/s/ Mario Alba Jr.*

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MARIO ALBA JR.

SAMUEL H. RUDMAN  
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[Proposed] Lead Counsel for Plaintiffs

**CERTIFICATE OF SERVICE**

I, Mario Alba Jr., hereby certify that on October 9, 2007, I caused a true and correct copy of the attached:

Notice of Motion for Consolidation, Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel;

Memorandum in Support of the Motion of the Macomb County Employees' Retirement System for Consolidation, Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel; and

Declaration of Mario Alba Jr. in Support of the Motion of the Macomb County Employees' Retirement System for Consolidation, Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel

to be served: (i) electronically on all counsel registered for electronic service for this case; and (ii) by first-class mail to all additional counsel on the attached service list.

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*/s/ Mario Alba Jr.*

Mario Alba Jr.

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Service List - 10/9/2007 (07-0203)

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